

1. The FCC should adopt standards; no program should be considered "captioned" unless it meets minimum standards for completeness, accuracy, readability, and synchronicity with the audio.

Real Time - Accuracy: spelling , grammar, punctuation should be at not less than 95 percent.

Placement of captions should be in a double DEDICATED LINE at the bottom of the picture.

(The stock market should be moved to the top of the picture, and the picture adjusted so that the full picture is seen even when the captions are not running. Hearing people complain not about the words being given in writing, but about the placement of those words IN the picture and about their "flashing" onto the screen.)

Timing need to be set for real time captioning with ALL voicing with no less than a 3 second delay.

Identification of nonverbal sounds must be mandated and presented in words or with icons.

Style of captions Roll Up captioning by line is preferable and less distracting to watch and doesn't "give a light flash which is very distracting.) Adjustment of background color and color of type would help those with vision problems.

Captioning needs to be verbatim (even dirty words need to be in type!)

Type of font - should be Ariel as it's easier to read.

Pre-produced programming needs to have accuracy set at 99 percent with all of the other requirements

the same wither it is "canned production" or live captioning.

Emergency messaging when not part of a program needs to run at the top (over the stock market if need be, as a person who has an emergency to deal with isn't going to be looking for the stock market report!)

2. The FCC should establish and maintain a database with updated contact information for video programming distributors and providers, enabling consumers to quickly locate who to call with a complaint - name, address, TTY/toll free phone number, fax number, e-mail address. It should be updated within 7 days of any changes.

3. The FCC should adopt a captioning complaint form (per an example that was provided in the petition to give a standard way to report problems) And MOST IMPORTANTLY the FCC should change the complaint rules to require responses to complaints on quality issues within 30 days. Currently it could take up to 4 months if a consumer submits a complaint at the beginning of a quarter.

4. The FCC should establish fines as a penalty for captioning that is missing, dropped, garbled, inaccurate, etc. We suggested a base \$8,000 per infraction, the same as the fine for not meeting the children's television programming requirements.

5. The FCC should require compliance reports from "video program distributors" (broadcast, cable, satellite) and do audits to ensure the effective implementation of captioning requirements.

6. The FCC should extend the ban against using electronic newsroom technique (ENT) beyond the "top 25 television markets" (detailed in Part 1). We need the news not just at home but when we travel, and captions provided through ENT leave out much of the most important information we need - weather and travel updates, live interviews and field reports. This was especially noted as a need when I was out on the road when the hurricanes were headed for New Orleans and Houston!

7. I do think that filing of electronic requests for exemption from the closed captioning rules should be permitted. HOWEVER, I do think that those should be made available for public viewing at an FCC site... and the public receive notice that an exemption has been submitted. This could be done by "user public" via the FCC "interested party" automatic e-mail notice list. And from the time that notice is SUBMITTED and SENT to the public should be no more than a week. I think there needs to be 30 days for the public to respond and ruling sent back to the applicant. I also think that the applicant MUST caption while waiting for that response.

(That might give them some real data on the cost.. as many that I've seen haven't even bothered to locate a captioner and determined the cost. When they do they MIGHT withdraw their request for exemption and they need to know that they can do that.)

8. The FCC should require continuous monitoring by video program distributors or providers - and routine checks of their equipment -- to ensure that technical problems are remedied promptly and efficiently. I have found that many stations, which have a bank of TV screens haven't even set ONE up to see the captioning that they offer.

The FCC should also require video programming distributors to reformat edited or compressed captioning. This would prevent one of the common problems: programs being rebroadcast which haven't been reformatted are often erroneously labeled as captioned in program guides. Software is now available to extract captioning data before video compression and reinsert it afterwards.

9. The FCC should uphold its requirement that programming distributors be held responsible for captioning, not the captioning agency. If they're going to pay for the services of a captioning company, they need to monitor the work and set their contracts to fire the company if it doesn't provide what they need.